



Columbia Environmental Field Office  
Division of Air Pollution Control  
1421 Hampshire Pike  
Columbia, TN 38401

May 21, 2020  
Via Electronic Transmittal to:  
[APC.ColuEFO@tn.gov](mailto:APC.ColuEFO@tn.gov)

**Subject: Sonoco Protective Solutions, Inc. -Tullahoma, TN Title V  
Annual Compliance Certifications through March 31, 2020  
Operating Permit No. 571196**

Dear Sir or Madam:

Pursuant to conditions B5, B6 and E2(b) of the above-referenced Title V Operating Permit, we are submitting an electronic copy of the Annual Compliance Certification (ACC) required for the 12-month period ending March 31, 2020 to the Columbia Field Office today via e-mail.

The facility had intermittent compliance with section E3-7 due to data entry errors in the database used to track VOC and HAP emissions. The VOC were overstated by approximately 3 tons per month and HAP emissions were estimated to be understated by approximately 400 pounds. The difference between the Sept. 2019 original vs the revised HAP total was less than 400 lbs, and the difference became progressively less, until by February it was only about 200 pounds. At no time did the emissions exceed the limits specified in the permit. All recordkeeping errors have been corrected and reported on the Semi-Annual Report submitted separately.

A paper copy of the ACC is also being sent to the Region 4 Office of the USEPA via UPS delivery.

If there are any questions, comments or concerns pertaining to this submittal, or regarding the accompanying Semi-Annual Report, please contact me by phone at 843-309-7418, or via e-mail at [tim.trumbull@sonoco.com](mailto:tim.trumbull@sonoco.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Trumbull', is written over a light blue horizontal line.

Tim Trumbull  
Environmental Principal – Sonoco Products Co.  
Sonoco Global Environmental Services

enclosure

cc: USEPA Region 4: (Via UPS Tracking: 1Z1AW1030291443405)  
Plant Manager

*Sonoco Products Co.  
1 N. Second St.  
Hartsville, SC 29550*

**TITLE V ANNUAL CERTIFICATION OF COMPLIANCE**

Facility Name: SONOCO PROTECTIVE SOLUTIONS, INC.  
 Facility Location: TULLAHOMA, TN Emission Source Reference No.: 16-0123

Title V Permit Number	Reporting Period	Report Deadline
571196	April 1, 2019 through March 31, 2020	May 30, 2020

Admin Amendment #1: 2-16-18; Admin Amend. #2: 4-11-18

This report is required pursuant to TNAPCR 1200-3-9-.02(1)(c)3(v)(III) and 40 CFR Part 70.6(c)(5)(iii).

**COMPLIANCE STATEMENT**

ITEM (b): Identification of Each Term or Condition of the Permit	Condition Description and identification of the methods or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.	ITEM (c): Indicate whether such methods identified in (b) provide continuous or intermittent data.	ITEM (d): Indicate the status of compliance with the terms and conditions of the permit for the period covered by this certification, including whether compliance was continuous or intermittent.
A1.	Terms not otherwise defined in the permit shall have the meaning assigned to such terms in TAPCR 1200-3. [Statement]	N/A	Compliance Status N/A - Statement of Fact
A2.	The permittee shall comply with all conditions of its permit. [RK, FM, IN]	Intermittent	Continuous Compliance - No Deviations
A3.	The need to halt or reduce activity is not a defense for noncompliance. [RK,FM, IN]	Intermittent	Continuous Compliance - No Deviations
A4.	The permit may be modified, revoked, reopened, and reissued, or terminated for cause. [Statement]	N/A	Compliance Status N/A - Statement of Fact
A5.	The permit does not convey any property rights of any sort, or any exclusive privilege. [Statement]	N/A	Compliance Status N/A - Statement of Fact
A6.	The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing. [RK]	Intermittent	Continuous Compliance - No requests during report period
A7.	The requirements of this permit are severable. [Statement]	N/A	Compliance Status N/A - Statement of Fact
A8(AA1).	The permittee shall pay an annual major source emission fee based upon the responsible official's choice of actual emissions or allowable emissions. [RK]	Intermittent	Continuous Compliance - No Deviations
A9.	A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit. [Statement]	Intermittent	Compliance Status N/A - Statement of Fact
A10.	Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or his authorized representative to enter and inspect the facility. [O = Work Practice]	Intermittent	Continuous Compliance - No Deviations
A11.	Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance. [Statement]	N/A	Continuous Compliance - No Deviations
A12.	Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. [RK]	Intermittent	Continuous Compliance - No Deviations
A13.	A permit can be reopened and revised prior to the expiration of the permit for various reasons. [Statement]	N/A	Compliance Status N/A - Statement of Fact
A14.	An administrative permit amendment allows for a change of ownership or operational control of a source upon approval of the Technical Secretary. [Statement]	N/A	Compliance Status N/A - Statement of Fact
A15.	When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200 3 9 .03(1) and TAPCR 1200-3-15-.03. [OMP]	Intermittent	Continuous Compliance - No Deviations, no such events declared.
A16.	Unless exempt, the permittee must obtain an approved construction permit for any new or modified air contamination source. [RK]	Intermittent	Continuous Compliance - No Deviations
A17.	The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit. (a) change in air pollution control equipment (b) change in stack height or diameter (c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature. [OMP, IN]	Intermittent	Continuous Compliance - No Deviations
A18.	The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions. [RK, IN, O=Work Practice]	Intermittent	Continuous Compliance - No Deviations
A19.	The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs). [RK, IN]	Intermittent	Continuous Compliance - No Deviations
A20.	The permittee shall comply with the requirement to submit to the Administrator or designated State Agency a risk management plan, including a registration that reflects all covered processes, by June 21, 1999, if the permittee's facility is required pursuant to 40 CFR, 68, to submit such a plan. [RK]	Intermittent	Continuous Compliance - Condition not applicable to facility
B1.	Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. [RK, FM, VEM]	Intermittent	Continuous Compliance - No Deviations
B2.	The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years. [RK]	Continuous	Continuous Compliance - No Deviations
B3.	Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. [RK]	Intermittent	Continuous Compliance - No Deviations
B4.	Any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. [RK]	Intermittent	Continuous Compliance - No Deviations
B5.	The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. [RK]	Intermittent	Continuous Compliance - No Deviations

**TITLE V ANNUAL CERTIFICATION OF COMPLIANCE**

Facility Name: SONOCO PROTECTIVE SOLUTIONS, INC.  
 Facility Location: TULLAHOMA, TN Emission Source Reference No.: 16-0123

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571196	April 1, 2019 through March 31, 2020	May 30, 2020

Admin Amendment #1: 2-16-18; Admin Amend. #2: 4-11-18

This report is required pursuant to TNAPCR 1200-3-9-.02(11)(c)3(v)(III) and 40 CFR Part 70.6(c)(5)(iii).

**COMPLIANCE STATEMENT**

ITEM #1: Identification of Each Term or Condition of the Permit	ITEM (b): Description and identification of the methods or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.	ITEM (c): Indicate whether such methods identified in (b) provide continuous or intermittent data.	ITEM (d): Indicate the status of compliance with the terms and conditions of the permit for the period covered by this certification, including whether compliance was continuous or intermittent.
B6(AA1).	The annual compliance certification shall be submitted to the State of Tennessee (Columbia EFO) and Region IV of the USEPA. [RK]	Intermittent	Continuous Compliance - No Deviations
B7.	Per the terms of this permit condition, an emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. [RK, OMP]	Intermittent	Continuous Compliance - No Deviations
B8.	The permittee shall provide prompt notification, per the terms of this condition, when breakdowns or malfunctions cause excess emissions. [RK, OMP]	Intermittent	Continuous Compliance - No Deviations
B9.	The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. [OMP, O=Work Practices]	Intermittent	Continuous Compliance - No Deviations
B10.	Condition is now 'Reserved'. Previous Permit Condition B.10 dealt with Sources located in non-attainment areas, which was Not Applicable to this facility.	N/A	Not Applicable to this Facility
B11.	The permittee must submit within twenty (20) days after receipt of the notice of violation, the data listed in this section to assist the Technical Secretary in deciding whether to excuse or validate the violation. [RK]	Intermittent	Continuous Compliance - No Deviations
D1.	The permittee must comply with all visible emission standards as specified in this condition of the permit. [RK, OMP, VEM]	Intermittent	Continuous Compliance - No Deviations
D2.	Any person constructing or establishing a non-portable gaseous air contaminant source must use the best available control technology. [RK, IN]	Intermittent	Continuous Compliance - No Deviations
D3.	The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-3-6. [OMP, IN]	Intermittent	Continuous Compliance - No Deviations
D4.	Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary. [IN, O=Work Practices]	Intermittent	Continuous Compliance - No Deviations
D5.	The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-3-7. [FM, OMP, IN]	Intermittent	Continuous Compliance - No Deviations
D6.	The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-3-14. New process sources shall utilize the best available control technology. [FM, OMP, IN]	Intermittent	Continuous Compliance - No Deviations
D7.	The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. [O=Work Practices]	Intermittent	Continuous Compliance - No Deviations
D8.	The permittee shall comply with the TAPCR 1200-3-4-.04 for all open burning activities at the facility. [O=Work Practices]	Intermittent	Continuous Compliance - No Deviations
D9.	In regard to asbestos, the permittee shall comply with the requirements of 1200 3 11 .02(d) when conducting any renovation or demolition activities at the facility. [OMP, IN]	Intermittent	Continuous Compliance - No Deviations
D10.	The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.	Intermittent	Continuous Compliance - No Deviations
E1(AA2).	Fee Payment based on Calendar Year Annual Accounting Period; Method specified in Title V Permit. [RK]	Intermittent	Continuous Compliance - No Deviations
E2.	Reporting Requirements and dates specified for (a) Semi-annual reports, and (b) Annual Compliance Certification. Reports to be submitted to State of Tennessee (Columbia EFO) and USEPA Region IV. [RK]	Intermittent	Continuous Compliance - No Deviations
E3-1(AA1).	Notify TN APC within 30 days of a change in Responsible Official, Facility/Billing Contact or Signatory Official.	Intermittent	Continuous Compliance - No Deviations
E3-2.	Logs and Records (C of A's and/or MSDS Records) required by the Permit are to be maintained and kept on site for at least five years. [RK]	Continuous	Continuous Compliance - No Deviations
E3-3.	Regarding any recordkeeping of logs, the following is applicable: a) For monthly recordkeeping, all data must be entered into the log no later than 30 days after the end of the month; b) For weekly recordkeeping, all data must be entered into the log no later than 7 days after the end of the week; and c) For daily recordkeeping, all data must be entered into the log no later than 7 days after the end of the day. [RK, O=Work Practice]	Intermittent	Intermittent Compliance - 2 Deviations
E3-4.	This Title V Operating Permit No. 571196 is a renewal of Title V Operating Permit No. 563808 issued June 30, 2011. [Statement]	N/A	Compliance Status N/A - Statement of Fact
E3-5.	The Permittee is not required to file an accidental release plan pursuant to Section 112(r) of the Clean Air Act and 1200-03-32 of TAPCR. [Statement]	N/A	Compliance Status N/A - Statement of Fact
E3-6.	This facility is not currently subject to regulations under 40 CFR Part 64 (Compliance Assurance Monitoring). [Statement]	N/A	Compliance Status N/A - Statement of Fact

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Admin Amendment #1: 2-16-18; Admin Amend. #2: 4-11-18

This report is required pursuant to TNAPCR 1200-3-9-.02(1)(e)3(v)(III) and 40 CFR Part 70.6(c)(5)(iii).

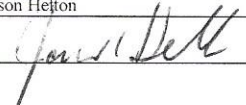
## **COMPLIANCE STATEMENT**

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E3-7.	Visible emissions from any stack shall not exceed 20% opacity, except for one, six-minute period in any one-hour period, and for no more than four, six-minute periods in any 24-hour period. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E3-8.	The source shall comply with all applicable state and federal air regulations including 40 CFR Part 60 for sources of HAP emissions and 40 CFR Part 63 New Source Performance Standards.	Intermittent	Continuous Compliance - No Deviations
E3-9.	The source shall operate in compliance with the Permit's terms and the information submitted in its approved Permit Application.	Intermittent	Continuous Compliance - No Deviations
E3-10.	Purchase orders and invoices for all VOC and HAP-containing materials, and all MSDSs shall be made available upon request by the Technical Secretary and shall be retained for a period of not less than five years. [RK]	Intermittent	Continuous Compliance - No Deviations, but Condition added in Title V Permit Renewal issued 7-2017. Exceeds corporate record retention period for PO's/Invoices. Will retain for 5 years from 7-2017 Permit issue date.
E3-11.	The VOC content of all materials used at the facility shall be determined by using MSDSs or supplier formulation data explicitly listing the VOC content by weight. [RK]	Intermittent	Continuous Compliance - No Deviations
E3-12.	The boilers identified in Condition E4-3 are gas fired boilers and therefore exempt from the Boiler MACT rule (40 CFR Part 63 Subpart JJJJJ) if they comply with Condition E4-4. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E4-1.	Process VOC Limit: 248 tons per any consecutive 12-month period. Keep emissions records for 5 years. Method specified in Title V Permit. [RK]	Intermittent	Continuous Compliance - No Deviations
E4-2.	HAPs Emissions: Any single HAP shall not exceed 9.9 tons/12-months, and total HAPs shall not exceed 24.9 tons/12-months. Keep emissions records for 5 years. Method specified in Title V Permit. [RK]	Intermittent	Continuous Compliance - No Deviations
E4-3.	Boiler Heat Rating: Two boilers rated at 14.65 mmBtu/hr, one at 25.1 mmBtu/hr. Any capacity increases require compliance with TAPCR 1200-03-09-.01(1) and 1200-03-09-.02(1). [Statement]	N/A	Continuous Compliance - No Deviations
E4-4.	Fuel: Use only natural gas in the boilers. No. 2 fuel oil to be used only during periods of gas curtailment, gas supply interruptions and emergencies, or periodic testing of burners. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E4-5.	Boiler PM Limits for all Boilers shall not exceed 0.48 lbs/hour and 2.10 tons/12 consecutive months, based on firing natural gas. Method specified in Title V permit. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E4-6.	Boiler VOC Limits: 0.3 lbs/hour and 1.31 tons/12 consecutive months, combined. Method specified in Title V permit. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E4-7.	Boiler CO Limits: 3.43 lbs/hour and 15.0 tons/year, combined. Method specified in Title V permit. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E4-8.	Boiler NOx Limits: 4.19 lbs/hour and 18.33 tons/year, combined. Method specified in Title V permit. [FM, RK]	Intermittent	Continuous Compliance - No Deviations
E4-9.	Boiler 05 NOx emissions shall be controlled to reduce NOx emissions by no less than 50% when combusting Natural Gas. Boiler 05 shall not operate with out low NOx burners and flue gas recirculation fully operational. [RK, OMP]	Intermittent	Continuous Compliance - No Deviations
E4-10.	NSPS: Boilers subject to Subpart Dc monthly fuel usage recordkeeping. Method specified in Title V permit. [RK, FM]	Intermittent	Continuous Compliance - No Deviations
E4-11.	Boiler Emission Calculations: Permittee shall calculate boiler actual emissions of NOx, PM, SO2, and VOC for each annual accounting period. This information shall be retained for five years. Method specified in Title V permit. [RK, FM]	Intermittent	Continuous Compliance - No Deviations
E4-12.	The Boilers are subject to NSPS Subpart Dc semi-annual reporting requirements, same time periods as other Permit semi-annual reporting. Method specified in Title V permit. (Intermittent Data)	Intermittent	Continuous Compliance - No Deviations

**Monitoring Method Abbreviations:** RK = Recordkeeping & Reporting; ST = Source Testing; OM = Opacity Monitoring; FM = Fuel Monitoring; VE = Visible Emissions Monitoring; OMP = Compliance Monitoring Plan; IN = Inspection; Other = Method not listed, provide description; Statement = Method N/A - condition is a statement of fact.

## **RESPONSIBLE OFFICIAL CERTIFICATION**

I, the undersigned, am the responsible official as defined in TAPCR 1200-3-9-.02(1)(b)21. of the Title V source for which this document is being submitted. With the possible exception of those permit terms and conditions identified above (referring to a list of deviations, exceedances and excursions), the emission sources described in Permit #563808 were in compliance with all permit terms and conditions over the previous year identified above, as determined by all required testing and monitoring in the permit and other material information. I hereby certify, based on the information and belief formed after reasonable inquiry, that the statements made and data contained in this document are true, accurate, and complete.

Name: Jason Helton  
 Signature: 

Title: Automotive Segment Manager  
Sonoco Protective Solutions  
 Date: 5/19/2020